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City of Arts & Innovation

March 3, 2020

Honorable Bill Jahn Southern California Association of Governments Attn. SCAG Regional Council 900 Wilshire Blvd. Ste. 1700 Los Angeles, CA 90017

Subject: Staff Recommended Regional Housing Needs Assessment (RHNA) Methodology as approved by the California Department of Housing and Community Development (HCD)

Dear President:

As representatives of Southern California, we would like to thank you for promoting open and inclusive engagement surrounding Southern California Association of Governments' (SCAG) recommended RHNA methodology. We understand that finding a methodology that allocates housing while meeting statutory requirements across 197 jurisdictions that are economically, demographically and geographically diverse is a challenging task, and all stakeholders must have an opportunity to share their opinions.

We support the methodology that was approved by SCAG's Regional Council on November 7, 2019, reviewed by HCD, and determined to successfully further the state's five housing objectives. HCD's review was robust and applauded "the use of objective factors specifically linked to the statutory objectives in the existing need methodology."

The recent proposal presented by the City of Cerritos as a compromise would change the existing need methodology by reintroducing the "Household Growth 2030-2045" factor, which is already the basis of the projected need portion of the methodology. This change would not be a compromise; it would be movement away from portions of the methodology that were highlighted and applauded by HCD in their response and would especially damage progress in furthering statutory objectives 1, 3 and 5. We also believe that the time for proposing changes to the methodology for the 6th cycle has ended; a clear appeals process is in place for jurisdictions that would like to ask for adjustments to their allocations.

Finally, we appreciate SCAG staff's efforts to keep this process moving forward and strongly object to any other jurisdictions' attempts to delay the process, putting timely adoption of a Regional Transportation Plan/Sustainable Communities Strategy and local jurisdiction housing element updates in jeopardy. Funding, local planning and several other vital processes are connected to the RHNA adoption timeline and given the size of SCAG's jurisdiction, it will be important to allocate ample time to these next steps.

We believe that this SCAG staff recommended final methodology will result in a distribution of units that is consistent with state legislation, sound regional planning and good public policy.

Respectfully.

William R. "Rusty" Bailey, III Mayor, City of Riverside

District 68 Representative, SCAG Regional Council

Frank Navarro

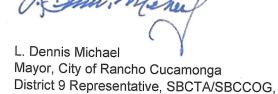
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